

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

In Re:	:	
	:	Chapter 13
Rhonda M. Stratton	:	Case No. 18-12684-JKF
	:	
Debtor,	:	
	:	
-----	:	
	:	
MTGLQ Investors, L.P.	:	
	:	
Movant,	:	
v.	:	Hearing: July 17, 2019 at 9:30 a.m.
	:	Courtroom # 3
Rhonda M. Stratton	:	
	:	
Debtor,	:	
And	:	
	:	
Scott F. Waterman, Esquire	:	11 U.S.C. §362(d) and §1301
Trustee,	:	
	:	
Respondent.	:	
-----	:	

**STIPULATION RESOLVING
MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AND CO-DEBTOR STAY**

THIS matter being opened to the Court by Brian E. Caine, Esquire, of the law office of Parker McCay P.A., attorney for the secured creditor, MTGLQ Investors, L.P. (hereinafter “Movant”), upon a Motion for Relief from the Automatic Stay and Co-Debtor Stay as to Real Property, more commonly known as 3308 Haverford Avenue, Philadelphia, PA 19104; and James P. McGarrity, Esquire appearing on behalf of Debtor, Rhonda M. Stratton, and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. As of July 17, 2019, the post-petition arrears is **\$15,448.42**, as the debtor is presently due for the May 1, 2019 through July 1, 2019 post-petition mortgage payments.

2. Starting with the July 1, 2019 post-petition mortgage payment, and through and including the May 1, 2020 post-petition mortgage payment, debtor agrees to make the regular monthly payments to Movant as they become due – as a form of adequate protection. (The July 1, 2019 payment will be due July 25, 2019).

3. If the debtor fails to make any of the payments stated herein, as those payments become due, then Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay and co-debtor stay as to the mortgaged property herein.

4. The debtor intends to cure all of the pre-petition arrears and post-petition arrears by December 31, 2019. If the debtor does not cure all of the pre-petition arrears and post-petition arrears by December 31, 2019, then the debtor intends to sell the property by May 31, 2020.

5. If the debtor fails to sell the property by May 31, 2020, then Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay and co-debtor stay as to the mortgaged property herein.

The undersigned hereby consent to the form and entry of the within Stipulation.

/s/Brian E. Caine
Brian E. Caine, Esquire
Attorney for Movant

/s/James P. McGarrity
James P. McGarrity, Esquire
Attorney for Debtor

/s/Polly A. Langdon
Concurrence by the Chapter 13 Trustee

AND NOW, this 7th day of August, 2019, it is hereby ORDERED

that the foregoing Stipulation is approved, ~~xxx~~



Jean K. FitzSimon
Jean K. FitzSimon
U.S. Bankruptcy Judge
Eastern District of Pennsylvania